



November 25, 2024

VIA ECF

The Honorable Robyn F. Tarnofsky
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *Abuladze, et al. v. Apple Commuter, Inc., et al.*
Case No.: 1:22-cv-08684-GHW-RFT

Dear Judge Tarnofsky:

We represent Defendant Edison Management Co. Inc. in the above-referenced action. We are pleased to write on behalf of all active parties to inform the Court that the parties have resolved their outstanding issues and agreed in principle to settle the claims of the named Plaintiffs and putative class against those Defendants who have appeared in this action.¹

The parties intend in the coming weeks to make a motion to the Court for approval of the class settlement. We respectfully request that the Court set a January 15, 2025 deadline to submit that motion and supporting documentation.

Thank you for the Court's continued attention to this matter.

Respectfully submitted,

George D. Vallas, Esq.

¹ The settling defendants include: (a) Apple Commuter, Inc.; (b) Biren Shah; (c) Edison Management Co. LLC a/k/a Edison Hotel; (d) 237 West 54 Owner LLC a/k/a Hilton Garden Inn (54); (e) HHLP 52 Lessee LLC a/k/a Hilton Garden Inn (52); (f) Brisam Management DE LLC a/k/a Holiday Inn Chelsea; (g) Patel Khanbudhai/Comfort Inn a/k/a Comfort Inn Chelsea/Heritage Hotel; (h) Wolcott Hotel Co. a/k/a Wolcott Hotel; (i) S&G Hotel Corp. a/k/a St. James Hotel; (j) Eros Management & Realty LLC a/k/a TRYP by Wyndham; and (k) Executive Le Soleil New York LLC a/k/a Executive Hotel Le Soleil New York.

The Honorable Robyn F. Tarnofsky

October 25, 2024

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CC: All Counsel of Record (via ECF)